



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 9, 2021

By Email and ECF

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Todd D. Greenberg
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, November 24, 2020, December 17, 2020, February 11, 2021 and February 19, 2021. The government renews its request for reciprocal discovery from the defendants.

Specifically, enclosed please find the following materials, which are subject to the protective order entered in this case on May 29, 2020:

| Records | Bates Number |
|--|-------------------------------------|
| Email messages and other electronically stored information | AVTESI_0003747463-AVTESI_0004903454 |

This material can be obtained by contacting John Palermo at Dupe Coop at 973-895-1359 and requesting the production designated by Dupe Coop as Production 09. The data are presently available as load files containing native, text and TIFF files; the government expects to make an iPro Eclipse production of the same data available shortly.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)